

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

DOUGLAS JOHNSON,)	
)	
Plaintiff,)	22-cv-3718
v.)	
)	
COOK COUNTY SHERIFF THOMAS)	Hon. Robert W. Gettleman
DART, in his official capacity,)	Hon. Mag. Heather K. McShain
ANTWAUN BACON, a CCDOC officer, and)	
COOK COUNTY, a municipal corporation,)	
)	
Defendants.)	

AGREED MOTION TO EXTEND FACT DISCOVERY

The Plaintiff, DOUGLAS JOHNSON, by and through his attorneys of DVORAK LAW OFFICES, LLC, and with the agreement of the Defendants, hereby moves this Honorable Court to extend the close of fact discovery from November 27, 2023, to February 27, 2024. In support of this motion, the Plaintiff states the following:

1. The Parties have exchanged written discovery.
2. The Depositions of the Plaintiff and Defendant Bacon were scheduled to be completed by November 3, 2023. However, a death in the family of counsel for the Defendant Bacon, and related family obligations, required that the depositions be postponed.
3. Counsel for the Defendant County also requested, due to a heavy caseload at the Civil Division of the State's Attorney's Office, that the depositions be postponed until after the Thanksgiving holiday.

4. The Plaintiff is represented by attorneys of a small firm with heavy caseload of criminal and civil matters in the months of December of 2023 and January of 2024.
5. The Plaintiff, with the agreement of the Defendants, therefore, asks that fact discovery be extended to February 27, 2024.

WHEREFORE, for all the reasons stated above, the Plaintiff asks that discovery be extended to February 27, 2024.

Dated: November 27, 2023

Respectfully Submitted,
/s/ Adrian Bleifuss Prados
Adrian Bleifuss Prados

One of the Attorneys for the Plaintiff

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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that on November 27, 2023, counsel for the Plaintiff filed the attached motion and served a copy of the same upon counsel of record via the Court's electronic filing system.

Respectfully Submitted,
/s/ Adrian Bleifuss Prados
Adrian Bleifuss Prados

One of the Attorneys for the Plaintiff

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